

THE HONORABLE JAMES L. ROBERT

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

ZUNUM AERO, INC.,

Plaintiff,

vs.

THE BOEING COMPANY; BOEING
HORIZONX VENTURES, LLC,

Defendants.

Case No. 2:21-cv-00896-JLR

**JOINT STIPULATION AND ~~[PROPOSED]~~
ORDER ON SEALING**

NOTED ON MOTION CALENDAR:
May 3, 2024

Pursuant to this Court’s Minute Order dated April 23, 2024 (Dkt. 584, the “Minute Order”), Plaintiff Zunum Aero, Inc. (“Zunum”) and Defendants The Boeing Company and Boeing HorizonX Ventures, LLC (“Boeing”) (collectively, the “Parties”), hereby submit this Joint Stipulation and Proposed Order (“Joint Stipulation”).

WHEREAS, pursuant to the Minute Order, the parties must file a joint stipulated motion and proposed order regarding sealing no later than 5/3/2024;

WHEREAS, the Parties have conferred regarding their collective sealing requests in Dkts # 494, 502, 520, and 541;

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Hueston Hennigan LLP
523 West 6th St., Suite 400
Los Angeles, CA 90014
(213)788-4340

WHEREAS, the Parties have conferred as to whether the following documents should remain under seal, be filed in redacted form, or be unsealed;

WHEREAS, in entering this Joint Stipulation, the Parties do not concede that any party's "Confidential" or "Highly Confidential – Attorneys' Eyes Only" materials or information do, in fact, contain that party's confidential information. The Parties expressly reserve the right to argue that any material or information does not contain confidential information and should not have been designated as "Confidential" or "Highly Confidential – Attorneys' Eyes Only" under the Stipulated Protective Order.

NOW, THEREFORE, the Parties respectfully propose that the following documents should remain under seal, be filed in redacted form, or be unsealed, as specified in the right-hand column below:

Docket 494: Boeing's Motion to Seal Documents Related to Boeing's Omnibus Motions <i>in Limine</i>			
Document	Zunum Proposal	Boeing Proposal	Joint Proposal
[Dkt. 496] Boeing's Omnibus Motions <i>in Limine</i>	N/A	N/A	Unseal
[Dkt. 499] Greer Declaration Exhibit 1	Redact portions	N/A	Redact portions
[Dkt. 500] Greer Declaration Exhibit 3	Redact portions	N/A	Redact portions
[Dkt. 501] Greer Declaration Exhibit 4	Seal entirely	N/A	Seal entirely

Docket 502: Zunum's Motion to Seal Documents Related to Zunum's Motion <i>in Limine</i>			
Document	Zunum Proposal	Boeing Proposal	Joint Proposal
[Dkt. 506] Zunum's Motion <i>in Limine</i>	Redact portions	N/A	Redact portions

Docket 502: Zunum's Motion to Seal Documents Related to Zunum's Motion *in Limine*

Document	Zunum Proposal	Boeing Proposal	Joint Proposal
[Dkt. 507] Baigent Declaration, Exhibit 1	N/A	Redact portions	Redact portions
[Dkt. 508] Baigent Declaration, Exhibit 2	N/A	N/A	Unseal
[Dkt. 509] Baigent Declaration, Exhibit 3	N/A	N/A	Unseal
[Dkt. 510] Baigent Declaration, Exhibit 5	Redact portions	N/A	Redact portions
[Dkt. 511] Baigent Declaration, Exhibit 6	Redact portions	N/A	Redact portions
[Dkt. 512] Baigent Declaration, Exhibit 7	Redact portions	N/A	Redact portions
[Dkt. 513] Baigent Declaration, Exhibit 8	Redact portions	N/A	Redact portions
[Dkt. 514] Baigent Declaration, Exhibit 9	Redact portions	Seal entirely	Seal entirely
[Dkt. 515] Baigent Declaration, Exhibit 10	N/A	N/A	Unseal
[Dkt. 516] Baigent Declaration, Exhibit 11	Redact portions	N/A	Redact portions

Docket 520: Zunum's Motion to Seal Documents Related to Zunum's Opposition to Boeing's Motion *in Limine*

Document	Zunum Proposal	Boeing Proposal	Joint Proposal
[Dkt. 540] Zunum's Opposition to	Redact portions	Redact portions	Redact portions

**Docket 520: Zunum's Motion to Seal Documents Related to Zunum's
Opposition to Boeing's Motion *in Limine***

Document	Zunum Proposal	Boeing Proposal	Joint Proposal
Boeing's Motion in Limine			
[Dkt. 523] Knapp Declaration, Exhibit A	Seal entirely	N/A	Seal entirely
[Dkt. 524] Knapp Declaration, Exhibit B	Seal entirely	N/A	Seal entirely
[Dkt. 525] Knapp Declaration, Exhibit C	Seal entirely	N/A	Seal entirely
[Dkt. 526] Knapp Declaration, Exhibit D	Seal entirely	N/A	Seal entirely
[Dkt. 527] Knapp Declaration, Exhibit E	Seal entirely	N/A	Seal entirely
[Dkt. 528] Knapp Declaration, Exhibit F	Seal entirely	N/A	Seal entirely
[Dkt. 529] Knapp Declaration, Exhibit G	Seal entirely	N/A	Seal entirely
[Dkt. 530] Knapp Declaration, Exhibit H	Seal entirely	N/A	Seal entirely
[Dkt. 532] Baigent Declaration	Redact portions	Redact portions	Redact portions
[Dkt. 533] Baigent Declaration, Exhibit 2	N/A	Redact portions	Redact portions
[Dkt. 534] Baigent Declaration, Exhibit 5	Seal entirely	N/A	Seal entirely
[Dkt. 535] Baigent Declaration, Exhibit 8	N/A	Seal entirely	Seal entirely

**Docket 520: Zunum's Motion to Seal Documents Related to Zunum's
Opposition to Boeing's Motion *in Limine***

Document	Zunum Proposal	Boeing Proposal	Joint Proposal
[Dkt. 536] Baigent Declaration, Exhibit 9	N/A	Seal entirely	Seal entirely
[Dkt. 537] Baigent Declaration, Exhibit 10	N/A	Redact portions	Redact portions
[Dkt. 538] Baigent Declaration, Exhibit 11	N/A	Seal entirely	Seal entirely

**Docket 541: Boeing's Motion to Seal Documents Related to Boeing's Amended
Opposition to Zunum's Motion *in Limine***

Document	Zunum Proposal	Boeing Proposal	Joint Proposal
[Dkt. 550] Boeing's Amended Opposition to Zunum's Motion in Limine	Redact portions	N/A	Redact portions
[Dkt. 545] O'Sullivan Declaration Exhibit 1	N/A	N/A	Unseal
[Dkt. 546] O'Sullivan Declaration Exhibit 2	Redact portions	N/A	Redact portions
[Dkt. 547] O'Sullivan Declaration Exhibit 3	N/A	N/A	Unseal
[Dkt. 548] O'Sullivan Declaration Exhibit 4	N/A	N/A	Unseal
[Dkt. 549] O'Sullivan	N/A	N/A	Unseal

Docket 541: Boeing's Motion to Seal Documents Related to Boeing's Amended Opposition to Zunum's Motion <i>in Limine</i>			
Document	Zunum Proposal	Boeing Proposal	Joint Proposal
Declaration Exhibit 5			

Dated: May 3, 2024

By: /s/ Scott M. Danner

Scott M. Danner, NY Bar #4853016
(admitted *pro hac vice*)
Brian T. Goldman, NY Bar #5616891
(admitted *pro hac vice*)
Charlotte Baigent, NY Bar #5979224
(admitted *pro hac vice*)
**HOLWELL SHUSTER &
GOLDBERG LLP**
425 Lexington Avenue, 14th Floor
New York, New York 10017
Telephone: (646) 837-8530
sdanner@hsgllp.com
bgoldman@hsgllp.com
cbaigent@hsgllp.com

Steven W. Fogg
CORR CRONIN LLP
1015 Second Ave, 10th Floor
Seattle, WA 98104
(206) 625-8600
sfogg@corrchronin.com

Counsel for Plaintiff

By: /s/ Yegor Fursevich

John C. Hueston
(Admitted *Pro Hac Vice*)
Email: jhueston@hueston.com
Moez M. Kaba
(Admitted *Pro Hac Vice*)
Email: mkaba@hueston.com
Yegor Fursevich
(Admitted *Pro Hac Vice*)
Email: yfursevich@hueston.com
Justin M. Greer
(Admitted *Pro Hac Vice*)
Email: jgreer@hueston.com
Cassidy O'Sullivan
(Admitted *Pro Hac Vice*)
Email: cosullivan@huston.com
HUESTON HENNIGAN LLP
523 West 6th Street, Suite 400
Los Angeles, CA 90014
Telephone: (213) 788-4340
Facsimile: (888) 866-4825

s/David A. Perez

David A. Perez, WSBA No. 43959
Susan E. Foster WSBA No. 18030
Madeline D. Swan WSBA No. 56355
PERKINS COIE LLP
1201 Third Avenue, Suite 4900
Seattle, WA 98101
(206) 359-8000
214-969-5100 (fax)
makairis@jonesday.com

Counsel for Defendants

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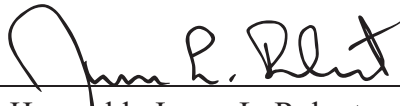
~~PROPOSED~~ ORDER

IT IS HEREBY ORDERED THAT, pursuant to the Parties' Joint Stipulation, and for compelling reasons and/or good cause shown:

1. The Parties shall jointly file redacted versions of the following documents within seven (7) days of this Order, except for any documents for which the agreed-upon publicly redacted version is already docketed: Dkts. 499, 500, 506, 507, 510, 511, 512, 513, 516, 532, 533, 537, 540, 546, 550;
2. The following documents shall remain under seal: Dkts. 499, 500, 501, 506, 507, 510, 511, 512, 513, 514, 516, 523, 524, 525, 526, 527, 528, 529, 530, 532, 533, 534, 535, 536, 537, 538, 540, 546, 550; AND
3. The Court directs the clerk to unseal the following documents: Dkts. 496, 508, 509, 515, 545, 547, 548, 549.

IT IS SO ORDERED.

DATED this 6th day of May, 2024.


The Honorable James L. Robart
United States District Judge